

ZHONG LUN NEW YORK LLP  
Two Wall Street, 21st Floor  
New York, NY 10005  
tel: (212) 380-8388  
fax: (212) 810-1995  
Kerry J. Kaltenbach

ZHONG LUN LAW FIRM LLP  
4322 Wilshire Blvd. Suite 200  
Los Angeles, CA 90025  
tel: (323) 930-5690  
fax: (323) 930-5693  
Leodis C. Matthews  
(*pro hac vice admission anticipated*)

*Attorneys for Defendant CENTRISYS CAPITAL, INC.*

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

---

WUHU CHANGJIA INVESTMENT FUND, LLP, a  
People's Republic of China limited liability partnership,

Plaintiff,

-against-

CENTRISYS CAPITAL, INC.,

Defendant.

---

Civil Action No.:

**NOTICE OF REMOVAL**

[removed from the Supreme Court  
of the State of New York,  
New York County,  
Index No. 657306/2019]

PLEASE TAKE NOTICE that Defendant CENTRISYS CAPITAL, INC. hereby removes this action from the Supreme Court of the State of New York, County of New York, where said case was originally filed and is currently pending under Index No. 657306/2019, to the United States District Court for the Southern District of New York. The removal is based upon 28 U.S.C. §§ 1332, 1441 and 1446, Local Civil Rule 81.1 and the following:

1. On or about December 9, 2019, Plaintiff WUHU CHANGJIA INVESTMENT FUND, LLP commenced this action in the Supreme Court of the State of New York, County of New York under Index No. 657306/2019 naming as a defendant CENTRISYS CAPITAL, INC. A copy of the summons and complaint are annexed hereto as Exhibit “A.”

2. Defendant CENTRISYS CAPITAL, INC. was successfully served on February 18, 2020 upon the undersigned firm’s agreement to accept service of the summons and complaint.

3. Removal of this action is made pursuant to 28 U.S.C. §§ 1332, 1441 and 1446, and Local Civil Rule 81.1 based upon complete diversity of the parties with an amount in controversy, demanded in the form of declaratory relief, exceeding \$75,000 exclusive of interest and costs.

4. There is complete diversity of the parties in this action. As set forth in complaint, Exhibit “A,” Plaintiff WUHU CHANGJIA INVESTMENT FUND, LLP is a People’s Republic of China limited liability partnership, although its principal place of business, jurisdiction of formation and any residences or domiciles of partners are unknown; and Defendant CENTRISYS CAPITAL, INC. is a corporation that is incorporated in and has its principal place of business in the State of Delaware.

5. It has been less than 30 days since successful service of the summons and complaint upon Defendant CENTRISYS CAPITAL, INC., and less than one year since commencement of this action.

Dated: New York, New York  
March 9, 2020

ZHONG LUN NEW YORK LLP

By:                     /s/                      
Kerry J. Kaltenbach  
Two Wall Street, 21st Floor  
New York, NY 10005  
e-mail: kerrykaltenbach@zhonglun.com  
tel: (212) 380-8388  
fax: (212) 810-1995

ZHONG LUN LAW FIRM LLP

By:                     /s/                      
Leodis C. Matthews  
*(pro hac vice admission anticipated)*  
4322 Wilshire Blvd. Suite 200  
Los Angeles, CA 90025  
email: leodismatthews@zhonglun.com  
tel: (323) 930-5690  
fax: (323) 930-5693

*Attorneys for Defendant  
CENTRISYS CAPITAL, INC.*